

EXHIBIT 20

CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No.: 3:07-cv-5944-SC
MDL NO.: 1917

This Document Relates To:

*Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
No. 3:13-cv-01173-SC*

*Sharp Electronics Corp., et al. v. Koninklijke Philips
Electronics N.V., et al., No. 3:13-cv-02776-SC*

**RESPONSE TO TOSHIBA
AMERICA INFORMATION
SYSTEMS, INC.'S FIRST SET OF
INTERROGATORIES TO SHARP
ELECTRONICS CORPORATION
AND SHARP ELECTRONICS
MANUFACTURING COMPANY OF
AMERICA, INC.**

1 **PROPOUNDING PARTY:** Toshiba America Information Systems, Inc.

2 **RESPONDING PARTIES:** Sharp Electronics Corporation and Sharp Electronics
3 Manufacturing Company of America, Inc.

4 **SET NO:** One

5 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 33.1
6 of the Local Civil Rules of the Northern District of California, Sharp Electronics Corporation
7 (“SEC”) and Sharp Electronics Manufacturing Company of America, Inc. (“SEMA”)
8 (collectively, “Sharp”) hereby respond to Defendant Toshiba America Information Systems,
9 Inc.’s (“TAIS”) First Set of Interrogatories dated August 1, 2014 (the “Interrogatories”) as
10 follows:

11 **GENERAL OBJECTIONS**

12 The following general objections (“General Objections”) are incorporated in
13 Sharp’s responses (“Responses”) to each and every interrogatory contained in the Interrogatories.
14 No Response to any interrogatory shall be deemed a waiver of Sharp’s General Objections.

15 1. Sharp objects to the Interrogatories and the instructions therein to the extent that they seek
16 to impose obligations on Sharp beyond those imposed by the Federal Rules of Civil Procedure,
17 the Local Civil Rules of the Northern District of California, or any applicable order of the Court.

18 2. Sharp objects to the Interrogatories on the grounds that they are improperly being used as
19 a discovery device, are oppressive, unduly burdensome and violate the rule of proportionality
20 embodied in Federal Rule of Civil Procedure 26(b)(2)(C).

21 3. Sharp objects to the Interrogatories to the extent that they seek or call for information that
22 can equally or more readily, conveniently, and in a less burdensome fashion be obtained by
23 Defendant from public sources.

24 4. Sharp objects to the Interrogatories to the extent that they seek or call for information that
25 can equally or more readily, conveniently, and in a less burdensome fashion be obtained by
26 Defendant from others.

27 5. Sharp objects to the Interrogatories to the extent that they seek information that is neither
28 relevant to this litigation, nor reasonably calculated to lead to the discovery of admissible

1 evidence. Further, these Responses and Objections are without prejudice to, and not a waiver of,
2 Sharp's right to contend at trial or otherwise in this action that such information is irrelevant,
3 immaterial, inadmissible, or not a proper basis for discovery, nor any objection by Sharp to any
4 future use of such information.

5 6. Sharp objects to the Interrogatories to the extent that they are unintelligible, vague,
6 ambiguous, overly broad, unduly burdensome, and oppressive.

7 7. Sharp objects to the Interrogatories to the extent that they seek or call for information not
8 in Sharp's possession, custody, or control.

9 8. Documents produced by Sharp in this litigation shall be deemed produced in response to
10 these Interrogatories, subject to the Responses and Objections contained herein. The burden of
11 identifying specific information or documents responsive to these Interrogatories from documents
12 produced in the course of this litigation is substantially the same for either party, and Sharp is
13 entitled to elect the option to produce business records pursuant to Rule 33(d) of the Federal
14 Rules of Civil Procedure.

15 9. Sharp objects to the Interrogatories to the extent that they seek or call for information or
16 documents protected from disclosure by the attorney-client privilege, the attorney work-product
17 doctrine, or any other privilege, protection, or immunity applicable under the governing law. Any
18 information disclosed pursuant to the Interrogatories will be disclosed without waiving, but on the
19 contrary reserving and intending to reserve, each of these privileges, protections, or immunities.
20 Any accidental disclosure of privileged information or material shall not be deemed a waiver of
21 the applicable privilege, protection, or immunity.

22 10. Sharp objects to the Interrogatories to the extent that they are duplicative and/or
23 cumulative, either internally of themselves or of discovery previously propounded to Sharp by
24 other defendants in this matter. Each such Interrogatory violates Section XV, subsections D and
25 E, of the Court's "Order Re Discovery and Case Management Protocol," entered on April 3,
26 2012. Order Re: Discovery and Case Management Protocol, *In re Cathode Ray Tube Antitrust*
27 *Litigation*, Case No. 07-cv-05944-SC, MDL No. 1917 (N.D. Cal. Apr. 3, 2012) (MDL Dkt. No.
28 1128).

11. Sharp objects to the Interrogatories to the extent that they call for expert testimony and states that Sharp will provide expert disclosures as provided by the Federal Rules of Civil Procedure and the orders of the Court.

12. Sharp objects to the Interrogatories to the extent that they call for speculation or call for a conclusion on an issue of law.

13. Sharp objects to the Interrogatories to the extent they seek information about contentions or call for all evidence or all information in support of allegations or contentions. Such Interrogatories are premature, Sharp has not completed its discovery and preparation in this matter, and its investigation of this case is ongoing. These responses are being made after reasonable inquiry into the relevant facts, and are based only upon the information and documentation that is presently known to Sharp. Further investigation and discovery may result in the identification of additional information or contentions, and Sharp reserves the right to supplement and modify its responses. Sharp's responses should not be construed to prejudice its right to conduct further investigation in this case, or to limit Sharp's use of any additional evidence that may be developed.

14. Sharp objects to, and expressly disclaims, any need or intent to prove any facts listed herein as a prerequisite to proving its claims at trial.

15. Sharp reserves its right to try its case as it determines is best at trial. This includes by not using facts or information stated herein or using facts or information in addition to those stated therein.

16. Sharp's responses will be subject to the Stipulated Protective Order entered in this action (MDL Dkt. No. 306).

17. Sharp objects to the Interrogatories to the extent they contain any incidental or implied admission of fact or law. Sharp's responses to all or any part of any Interrogatory should not be taken as an incidental or implied admission, agreement, or concurrence that: (i) Sharp accepts or admits an express or implied assumption of fact set forth in or assumed by the Interrogatory; (ii) Sharp accepts or admits any express or implied assumption of law set forth in or assumed by the Interrogatory; (iii) Sharp has in its possession, custody or control documents or information

1 responsive to that Interrogatory; or (iv) documents or information responsive to that Interrogatory
2 exist.

3 18. Sharp reserves its right to object to and/or challenge any evidence on grounds of
4 competency, relevance, materiality, privilege, or admissibility at trial or at any hearing or
5 proceeding with respect to any admissions sought by the Interrogatories and all answers Plaintiffs
6 provide in response to these Interrogatories.

7 19. Sharp objects to the extent the Interrogatories misrepresent Sharp's allegations and the
8 opinions expressed by Sharp's expert(s) in this case.

9 20. Sharp objects to Definition A because the construction of "all" to include "all, each, any,
10 and every" and is vague, ambiguous, and confusing, and likely to create multiple, contradictory
11 meanings from the same language.

12 21. Sharp objects to Definition B because the construction of "and" to include "or" and vice
13 versa is vague, ambiguous, and confusing, and likely to create multiple, contradictory meanings
14 from the same language. Sharp uses "and" and "or" according to their ordinary meanings.

15 22. Sharp objects to Definition G to the extent that it mischaracterizes Sharp's Complaint.
16 Sharp interprets the term "CRTs" as defined in its complaint as "CPTs and CDTs of all sizes."

17 23. Sharp objects to Definition H to the extent that it mischaracterizes and is inconsistent with
18 the definition of CRT Products in the Complaint.

19 24. Sharp objects to Definition I as vague, ambiguous, and unreasonably broad and,
20 depending upon Defendant's meaning may be potentially calling for a legal conclusion. Sharp
21 also objects to Definition I to the extent that it calls for documents that are subject to the attorney-
22 client privilege, the work-product doctrine, other applicable privilege, or are not in Sharp's
23 possession, custody or control.

24 25. Sharp objects to Definition K because it is overly broad, unduly burdensome, and
25 oppressive insofar as it requires that Sharp identify and locate numerous individuals involved in
26 thousands of discrete purchases made over the course of more than 12 years, dating back to 1995.
27 Sharp also objects to Definition K with respect to identifying persons and identifying events or
28

1 occurrences to the extent that it calls for information beyond Sharp's possession, custody or
2 control.

3 26. Sharp objects to definition FF as overbroad, vague, and not reasonably calculated to lead
4 to the discovery of admissible evidence. In responding to the Interrogatories directed to "You" or
5 "Your" Sharp will respond for the Plaintiffs SEC and SEMA and persons acting on their behalf.

6 27. Sharp objects to Definition GG because it is vague, ambiguous, and confusing and likely
7 to create multiple, contradictory meanings from the same language. Sharp refers to singular and
8 plural nouns according to their ordinary meanings.

9 28. Sharp objects to Definition HH because it is vague, ambiguous, and confusing and likely
10 to create multiple, contradictory meanings from the same language. Sharp uses the present and
11 past tenses according to their ordinary meanings.

12 29. Sharp objects to Instruction 1 to the extent that it calls for information that is the subject of
13 the attorney-client privilege, the work-product doctrine, or any other applicable privilege, or is
14 not in Plaintiffs' possession, custody or control.

15 30. Sharp objects to Instruction 8 as overbroad and unduly burdensome. Sharp uses the term
16 "identify" according to its ordinary meaning.

17 **RESPONSES TO INTERROGATORIES**

18 **Request No. 1:**

19 Describe in detail and in narrative form (including by Identifying each Document, Person
20 or other evidentiary source that You rely upon) the factual basis for your allegation that
21 Chunghwa PT and Chunghwa Malaysia each participated as a co-conspirator in the violations
22 alleged and "may have performed acts and made statements in furtherance thereof," as alleged in
23 paragraph 79 of the Amended Complaint.

24 **Response to Request No. 1:**

25 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
26 also objects to this Interrogatory to the extent that it calls for information that is already in the
27 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
28 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this

1 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
2 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case,
3 including all testimony, in responses to written discovery, but particularly while discovery is
4 ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial
5 information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,
6 and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete
7 record and review and analyze all information obtained in discovery thus far at this stage of this
8 litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,
9 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and
10 duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on
11 the grounds that it seeks, in contravention to well-established legal principles, to dismember the
12 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
13 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
14 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
15 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
16 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
17 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
18 Defendants and co-conspirators concealed the conspiracy by various means and methods,
19 including concealing the existence and nature of their conspiratorial activities and issuing regular
20 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
21 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
22 calls for information that is covered by attorney-client privilege or the work-product protection.
23 Sharp further states that it has not completed its discovery and preparation in this matter and that
24 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
25 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

26 Subject to and without waiving the foregoing objections, Sharp states that the response to
27 this Interrogatory may include the transactional data and documents produced by defendants, co-
28 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents

responsive to this Interrogatory from review of the documents and data identified in this response is substantially the same for either Sharp or TAIS. Sharp further states that information responsive to this Interrogatory is contained in the following, which are incorporated here by reference:

- Exhibit A to these Responses;
- Attachment A to these Responses;
- Deposition of C.C. Liu (February 19-21, 2013);
- Deposition of J.S. Lu (February 27-28, 2013);
- Deposition of S.J. Yang (February 22-26, 2013);
- the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying materials;
- the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying materials;
- the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and accompanying materials;
- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- Korean Fair Trade Commission Report on the CRT Conspiracy;
- The European Commission Report on the CRT Conspiracy;
- Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, No. 5 (February 10, 2012);
- Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12, 2013);
- Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);

- 1 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
2 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
4 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
5 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 6 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
7 of Interrogatories (July 10, 2014);
- 8 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
9 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 10 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
11 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 12 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
13 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
14 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (November 2, 2011);
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
19 Interrogatories (December 23, 2011);
- 20 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 24 • Philips Electronics North America Corporation's Responses to Direct Action
25 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 26 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
27 Interrogatories (May 12, 2010);
- 28

- 1 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 3 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 5 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
6 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
8 Admission (November 25, 2013);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 14 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
15 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 16 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
17 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
18 those Responses (July 28, 2014);
- 19 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
20 Interrogatories to Sharp (August 4, 2014);
- 21 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
22 2014);
- 23 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
26 4, 2014);
- 27 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
28 (August 4, 2014);

- 1 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 2 (August 21, 2014);
- 3 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 4 Interrogatories to Sharp (August 21, 2014); and
- 5 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 6 (August 25, 2014).

7 **Request No. 2:**

8 Describe in detail and in narrative form (including by Identifying each Document, Person

9 or other evidentiary source that You rely upon) the factual basis for your allegation that Orion,

10 Orion Engineering, and Domex each participated as a co-conspirator in the violations alleged and

11 "may have performed acts and made statements in furtherance thereof," as alleged in paragraph

12 79 of the Amended Complaint.

13 **Response to Request No. 2:**

14 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp

15 also objects to this Interrogatory to the extent that it calls for information that is already in the

16 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,

17 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this

18 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects

19 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case,

20 including all testimony, in responses to written discovery, but particularly while discovery is

21 ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial

22 information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,

23 and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete

24 record and review and analyze all information obtained in discovery thus far at this stage of this

25 litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,

26 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and

27 duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on

28 the grounds that it seeks, in contravention to well-established legal principles, to dismember the

1 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
2 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
3 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
4 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
5 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
6 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
7 Defendants and co-conspirators concealed the conspiracy by various means and methods,
8 including concealing the existence and nature of their conspiratorial activities and issuing regular
9 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
10 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
11 calls for information that is covered by attorney-client privilege or the work-product protection.
12 Sharp further states that it has not completed its discovery and preparation in this matter and that
13 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
14 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

15 Subject to and without waiving the foregoing objections, Sharp states that the response to
16 this Interrogatory may include the transactional data and documents produced by defendants, co-
17 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
18 responsive to this Interrogatory from review of the documents and data identified in this response
19 is substantially the same for either Sharp or TAIS. Sharp further states that information
20 responsive to this Interrogatory is contained in the following, which are incorporated here by
21 reference:

- 22 • Exhibit A to these Responses;
- 23 • Attachment A to these Responses;
- 24 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
25 materials;
- 26 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
27 materials;
- 28

- 1 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 2 accompanying materials;
- 3 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 4 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 5 • The European Commission Report on the CRT Conspiracy;
- 6 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 7 Set of Interrogatories, No. 5 (February 10, 2012);
- 8 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 9 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 10 2013);
- 11 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 12 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 13 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 14 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 15 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 16 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 17 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 18 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 20 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 21 of Interrogatories (July 10, 2014);
- 22 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 23 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 24 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 25 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 26 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 27 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 28

1 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
2 Interrogatories (November 2, 2011);

- 3 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
4 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
5 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories (December 23, 2011);
- 7 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 9 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 11 • Philips Electronics North America Corporation's Responses to Direct Action
12 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 13 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
14 Interrogatories (May 12, 2010);
- 15 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
16 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 17 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 19 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
20 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
22 Admission (November 25, 2013);
- 23 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
24 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
25 Interrogatories (February 10, 2012);
- 26 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
27 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
28

- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 3:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that IGC, IGE, and IDDC each participated as a co-conspirator in the violations alleged and "may have performed acts and made statements in furtherance thereof," as alleged in paragraph 79 of the Amended Complaint.

Response to Request No. 3:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because Defendants and co-conspirators concealed the conspiracy by various means and methods, including concealing the existence and nature of their conspiratorial activities and issuing regular instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to the extent this request calls for expert testimony. Sharp also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work-product protection. Sharp further states that it has not completed its discovery and preparation in this matter and that

1 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
2 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

3 Subject to and without waiving the foregoing objections, Sharp states that the response to
4 this Interrogatory may include the transactional data and documents produced by defendants, co-
5 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
6 responsive to this Interrogatory from review of the documents and data identified in this response
7 is substantially the same for either Sharp or TAIS. Sharp further states that information
8 responsive to this Interrogatory is contained in the following, which are incorporated here by
9 reference:

- 10 • Exhibit A to these Responses;
- 11 • Attachment A to these Responses;
- 12 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
13 materials;
- 14 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
15 materials;
- 16 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
17 accompanying materials;
- 18 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 19 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 20 • The European Commission Report on the CRT Conspiracy;
- 21 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
22 Set of Interrogatories, No. 5 (February 10, 2012);
- 23 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
24 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
25 2013);
- 26 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
27 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 28

- 1 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
2 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 3 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 5 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
6 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
7 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 8 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
9 of Interrogatories (July 10, 2014);
- 10 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
11 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 12 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
13 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 14 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
15 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
16 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
17 Interrogatories (November 2, 2011);
- 18 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
19 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
20 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories (December 23, 2011);
- 22 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 24 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
25 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 26 • Philips Electronics North America Corporation's Responses to Direct Action
27 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 28

- 1 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 2 Interrogatories (May 12, 2010);
- 3 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 4 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 5 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 8 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 10 Admission (November 25, 2013);
- 11 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 12 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 13 Interrogatories (February 10, 2012);
- 14 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 15 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 16 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 17 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 18 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 19 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 20 those Responses (July 28, 2014);
- 21 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 22 Interrogatories to Sharp (August 4, 2014);
- 23 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 24 2014);
- 25 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 28 4, 2014);

- 1 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
2 (August 4, 2014);
- 3 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
4 (August 21, 2014);
- 5 • Sharp's Response to Panasonic Corporation of North America's First Set of
6 Interrogatories to Sharp (August 21, 2014); and
- 7 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
8 (August 25, 2014).

9 **Request No. 4:**

10 Describe in detail and in narrative form (including by Identifying each Document, Person
11 or other evidentiary source that You rely upon) the factual basis for your allegation that LG
12 Electronics Taiwan participated as a co-conspirator in the violations alleged and "may have
13 performed acts and made statements in furtherance thereof," as alleged in paragraph 79 of the
14 Amended Complaint.

15 **Response to Request No. 4:**

16 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
17 also objects to this Interrogatory to the extent that it calls for information that is already in the
18 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
19 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
20 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
21 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case,
22 including all testimony, in responses to written discovery, but particularly while discovery is
23 ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial
24 information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,
25 and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete
26 record and review and analyze all information obtained in discovery thus far at this stage of this
27 litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,
28 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and

1 duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on
2 the grounds that it seeks, in contravention to well-established legal principles, to dismember the
3 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
4 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
5 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
6 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
7 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
8 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
9 Defendants and co-conspirators concealed the conspiracy by various means and methods,
10 including concealing the existence and nature of their conspiratorial activities and issuing regular
11 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
12 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
13 calls for information that is covered by attorney-client privilege or the work-product protection.
14 Sharp further states that it has not completed its discovery and preparation in this matter and that
15 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
16 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

17 Subject to and without waiving the foregoing objections, Sharp states that the response to
18 this Interrogatory may include the transactional data and documents produced by defendants, co-
19 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
20 responsive to this Interrogatory from review of the documents and data identified in this response
21 is substantially the same for either Sharp or TAIS. Sharp further states that information
22 responsive to this Interrogatory is contained in the following, which are incorporated here by
23 reference:

- 24 • Exhibit A to these Responses;
- 25 • Attachment A to these Responses;
- 26 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
27 materials;

- 1 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 2 materials;
- 3 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 4 accompanying materials;
- 5 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 6 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 7 • The European Commission Report on the CRT Conspiracy;
- 8 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 9 Set of Interrogatories, No. 5 (February 10, 2012);
- 10 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 11 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 12 2013);
- 13 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 14 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 15 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 16 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 17 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 19 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 20 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 21 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 22 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 23 of Interrogatories (July 10, 2014);
- 24 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 25 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 26 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 27 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 28

- 1 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 2 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 3 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 4 Interrogatories (November 2, 2011);
- 5 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 6 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 7 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 8 Interrogatories (December 23, 2011);
- 9 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 10 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 11 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 12 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Philips Electronics North America Corporation's Responses to Direct Action
- 14 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 15 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 16 Interrogatories (May 12, 2010);
- 17 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 18 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 19 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 20 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 22 (November 25, 2013);
- 23 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 24 Admission (November 25, 2013);
- 25 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 26 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 27 Interrogatories (February 10, 2012);
- 28

- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 5:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that LG.Philips Displays, LG.Philips Shuguang, LG.Philips Singapore, and PT.LP Indonesia

1 participated as a co-conspirator in the violations alleged and “may have performed acts and made
2 statements in furtherance thereof,” as alleged in paragraph 79 of the Amended Complaint.

3 **Response to Request No. 5:**

4 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
5 also objects to this Interrogatory to the extent that it calls for information that is already in the
6 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
7 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
8 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
9 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case,
10 including all testimony, in responses to written discovery, but particularly while discovery is
11 ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial
12 information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,
13 and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete
14 record and review and analyze all information obtained in discovery thus far at this stage of this
15 litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,
16 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and
17 duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on
18 the grounds that it seeks, in contravention to well-established legal principles, to dismember the
19 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
20 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
21 *Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
22 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
23 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
24 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
25 Defendants and co-conspirators concealed the conspiracy by various means and methods,
26 including concealing the existence and nature of their conspiratorial activities and issuing regular
27 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
28 the extent this request calls for expert testimony. Sharp also objects to the extent that this request

1 calls for information that is covered by attorney-client privilege or the work-product protection.
2 Sharp further states that it has not completed its discovery and preparation in this matter and that
3 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
4 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

5 Subject to and without waiving the foregoing objections, Sharp states that the response to
6 this Interrogatory may include the transactional data and documents produced by defendants, co-
7 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
8 responsive to this Interrogatory from review of the documents and data identified in this response
9 is substantially the same for either Sharp or TAIS. Sharp further states that information
10 responsive to this Interrogatory is contained in the following, which are incorporated here by
11 reference:

- 12 • Exhibit A to these Responses;
- 13 • Attachment A to these Responses;
- 14 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
15 materials;
- 16 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
17 materials;
- 18 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
19 accompanying materials;
- 20 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 21 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 22 • The European Commission Report on the CRT Conspiracy;
- 23 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
24 Set of Interrogatories, No. 5 (February 10, 2012);
- 25 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
26 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
27 2013);

- 1 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 3 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 4 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 5 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 7 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 8 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 9 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 10 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 11 of Interrogatories (July 10, 2014);
- 12 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 13 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 14 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 15 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories (November 2, 2011);
- 20 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 21 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 22 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 23 Interrogatories (December 23, 2011);
- 24 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 25 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 26 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 27 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 28

- 1 • Philips Electronics North America Corporation's Responses to Direct Action
2 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 3 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
4 Interrogatories (May 12, 2010);
- 5 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
6 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 7 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
8 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
10 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
12 Admission (November 25, 2013);
- 13 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
14 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (February 10, 2012);
- 16 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
17 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 18 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
19 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 20 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
21 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
22 those Responses (July 28, 2014);
- 23 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
26 2014);
- 27 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
28 Interrogatories to Sharp (August 4, 2014);

- 1 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 2 4, 2014);
- 3 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 4 (August 4, 2014);
- 5 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 6 (August 21, 2014);
- 7 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 8 Interrogatories to Sharp (August 21, 2014); and
- 9 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 10 (August 25, 2014).

Request No. 6:

12 Describe in detail and in narrative form (including by Identifying each Document, Person
13 or other evidentiary source that You rely upon) the factual basis for your allegation that
14 Mitsubishi Electric Japan, Mitsubishi Electric USA, Mitsubishi Digital participated as a co-
15 conspirator in the violations alleged and "may have performed acts and made statements in
16 furtherance thereof," as alleged in paragraph 46 of the Complaint.

Response to Request No. 6:

18 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
19 also objects to this Interrogatory to the extent that it calls for information that is already in the
20 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
21 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
22 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
23 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case,
24 including all testimony, in responses to written discovery, but particularly while discovery is
25 ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial
26 information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,
27 and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete
28 record and review and analyze all information obtained in discovery thus far at this stage of this

litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because Defendants and co-conspirators concealed the conspiracy by various means and methods, including concealing the existence and nature of their conspiratorial activities and issuing regular instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to the extent this request calls for expert testimony. Sharp also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work-product protection. Sharp further states that it has not completed its discovery and preparation in this matter and that its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its response to this Request consistent with Federal Rule of Civil Procedure 26(e).

Subject to and without waiving the foregoing objections, Sharp states that the response to this Interrogatory may include the transactional data and documents produced by defendants, co-conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents responsive to this Interrogatory from review of the documents and data identified in this response is substantially the same for either Sharp or TAIS. Sharp further states that information responsive to this Interrogatory is contained in the following, which are incorporated here by reference:

- Exhibit A to these Responses;
- Attachment A to these Responses;

- 1 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
- 2 materials;
- 3 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 4 materials;
- 5 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 6 accompanying materials;
- 7 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 8 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 9 • The European Commission Report on the CRT Conspiracy;
- 10 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 11 Set of Interrogatories, No. 5 (February 10, 2012);
- 12 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 13 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 14 2013);
- 15 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 16 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 17 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 18 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 19 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 20 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 21 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 22 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 23 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 24 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 25 of Interrogatories (July 10, 2014);
- 26 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 27 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 28

- 1 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 3 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
4 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
5 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories (November 2, 2011);
- 7 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
8 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
9 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories (December 23, 2011);
- 11 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
12 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 13 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
14 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 15 • Philips Electronics North America Corporation's Responses to Direct Action
16 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 17 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
18 Interrogatories (May 12, 2010);
- 19 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
20 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 21 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
22 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 23 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
24 (November 25, 2013);
- 25 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
26 Admission (November 25, 2013);
- 27
- 28

- 1 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 2 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 3 Interrogatories (February 10, 2012);
- 4 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 5 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 6 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 7 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 8 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 9 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 10 those Responses (July 28, 2014);
- 11 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 12 Interrogatories to Sharp (August 4, 2014);
- 13 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 14 2014);
- 15 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 16 Interrogatories to Sharp (August 4, 2014);
- 17 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 18 4, 2014);
- 19 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 20 (August 4, 2014);
- 21 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 22 (August 21, 2014);
- 23 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 24 Interrogatories to Sharp (August 21, 2014); and
- 25 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 26 (August 25, 2014).
- 27
- 28

Request No. 7:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that MTPD America participated as a co-conspirator in the violations alleged and “may have performed acts and made statements in furtherance thereof,” as alleged in paragraph 79 of the Amended Complaint.

Response to Request No. 7:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because

1 Defendants and co-conspirators concealed the conspiracy by various means and methods,
2 including concealing the existence and nature of their conspiratorial activities and issuing regular
3 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
4 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
5 calls for information that is covered by attorney-client privilege or the work-product protection.
6 Sharp further states that it has not completed its discovery and preparation in this matter and that
7 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
8 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

9 Subject to and without waiving the foregoing objections, Sharp states that the response to
10 this Interrogatory may include the transactional data and documents produced by defendants, co-
11 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
12 responsive to this Interrogatory from review of the documents and data identified in this response
13 is substantially the same for either Sharp or TAIS. Sharp further states that information
14 responsive to this Interrogatory is contained in the following, which are incorporated here by
15 reference:

- 16 • Exhibit A to these Responses;
- 17 • Attachment A to these Responses;
- 18 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
19 materials;
- 20 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
21 materials;
- 22 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
23 accompanying materials;
- 24 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 25 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 26 • The European Commission Report on the CRT Conspiracy;
- 27 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
28 Set of Interrogatories, No. 5 (February 10, 2012);

- 1 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
2 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
3 2013);
- 4 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
5 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 6 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
7 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 8 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 10 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
11 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
12 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
14 of Interrogatories (July 10, 2014);
- 15 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
16 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 17 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
18 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 19 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
20 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
21 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
22 Interrogatories (November 2, 2011);
- 23 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
24 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
25 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
26 Interrogatories (December 23, 2011);
- 27 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
28 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);

- 1 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 2 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 3 • Philips Electronics North America Corporation's Responses to Direct Action
- 4 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 5 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 6 Interrogatories (May 12, 2010);
- 7 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 8 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 9 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 10 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 12 (November 25, 2013);
- 13 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 14 Admission (November 25, 2013);
- 15 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 16 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 17 Interrogatories (February 10, 2012);
- 18 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 19 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 20 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 21 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 22 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 23 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 24 those Responses (July 28, 2014);
- 25 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 28 2014);

- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 8:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Samsung Elektronische Bauelemente participated as a co-conspirator in the violations alleged and "may have performed acts and made statements in furtherance thereof," as alleged in paragraph 79 of the Amended Complaint.

Response to Request No. 8:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,

1 and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete
2 record and review and analyze all information obtained in discovery thus far at this stage of this
3 litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,
4 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and
5 duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on
6 the grounds that it seeks, in contravention to well-established legal principles, to dismember the
7 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
8 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
9 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
10 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
11 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
12 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
13 Defendants and co-conspirators concealed the conspiracy by various means and methods,
14 including concealing the existence and nature of their conspiratorial activities and issuing regular
15 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
16 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
17 calls for information that is covered by attorney-client privilege or the work-product protection.
18 Sharp further states that it has not completed its discovery and preparation in this matter and that
19 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
20 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

21 Subject to and without waiving the foregoing objections, Sharp states that the response to
22 this Interrogatory may include the transactional data and documents produced by defendants, co-
23 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
24 responsive to this Interrogatory from review of the documents and data identified in this response
25 is substantially the same for either Sharp or TAIS. Sharp further states that information
26 responsive to this Interrogatory is contained in the following, which are incorporated here by
27 reference:

- 28 • Exhibit A to these Responses;

- 1 • Attachment A to these Responses;
- 2 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
- 3 materials;
- 4 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 5 materials;
- 6 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 7 accompanying materials;
- 8 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 9 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 10 • The European Commission Report on the CRT Conspiracy;
- 11 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 12 Set of Interrogatories, No. 5 (February 10, 2012);
- 13 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 14 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 15 2013);
- 16 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 17 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 18 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 19 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 20 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 21 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 23 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 24 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 25 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 26 of Interrogatories (July 10, 2014);
- 27 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 28 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);

- 1 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 3 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
4 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
5 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories (November 2, 2011);
- 7 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
8 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
9 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories (December 23, 2011);
- 11 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
12 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 13 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
14 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 15 • Philips Electronics North America Corporation's Responses to Direct Action
16 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 17 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
18 Interrogatories (May 12, 2010);
- 19 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
20 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 21 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
22 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 23 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
24 (November 25, 2013);
- 25 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
26 Admission (November 25, 2013);
- 27
- 28

- 1 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 2 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 3 Interrogatories (February 10, 2012);
- 4 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 5 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 6 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 7 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 8 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 9 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 10 those Responses (July 28, 2014);
- 11 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 12 Interrogatories to Sharp (August 4, 2014);
- 13 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 14 2014);
- 15 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 16 Interrogatories to Sharp (August 4, 2014);
- 17 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 18 4, 2014);
- 19 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 20 (August 4, 2014);
- 21 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 22 (August 21, 2014);
- 23 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 24 Interrogatories to Sharp (August 21, 2014); and
- 25 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 26 (August 25, 2014).
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Request No. 9:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Samtel participated as a co-conspirator in the violations alleged and “may have performed acts and made statements in furtherance thereof,” as alleged in paragraph 79 of the Amended Complaint.

Response to Request No. 9:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because Defendants and co-conspirators concealed the conspiracy by various means and methods,

1 including concealing the existence and nature of their conspiratorial activities and issuing regular
2 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
3 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
4 calls for information that is covered by attorney-client privilege or the work-product protection.
5 Sharp further states that it has not completed its discovery and preparation in this matter and that
6 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
7 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

8 Subject to and without waiving the foregoing objections, Sharp states that the response to
9 this Interrogatory may include the transactional data and documents produced by defendants, co-
10 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
11 responsive to this Interrogatory from review of the documents and data identified in this response
12 is substantially the same for either Sharp or TAIS. Sharp further states that information
13 responsive to this Interrogatory is contained in the following, which are incorporated here by
14 reference:

- 15 • Exhibit A to these Responses;
- 16 • Attachment A to these Responses;
- 17 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
18 materials;
- 19 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
20 materials;
- 21 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
22 accompanying materials;
- 23 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 24 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 25 • The European Commission Report on the CRT Conspiracy;
- 26 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
27 Set of Interrogatories, No. 5 (February 10, 2012);
- 28

- 1 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 2 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 3 2013);
- 4 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 5 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 6 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 7 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 8 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 10 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 11 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 12 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 14 of Interrogatories (July 10, 2014);
- 15 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 16 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 17 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 18 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 19 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 20 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 21 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 22 Interrogatories (November 2, 2011);
- 23 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 24 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 25 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 26 Interrogatories (December 23, 2011);
- 27 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 28 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);

- 1 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 2 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 3 • Philips Electronics North America Corporation's Responses to Direct Action
- 4 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 5 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 6 Interrogatories (May 12, 2010);
- 7 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 8 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 9 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 10 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 12 (November 25, 2013);
- 13 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 14 Admission (November 25, 2013);
- 15 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 16 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 17 Interrogatories (February 10, 2012);
- 18 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 19 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 20 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 21 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 22 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 23 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 24 those Responses (July 28, 2014);
- 25 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 28 2014);

- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 10:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Technologies Displays Mexicana participated as a co-conspirator in the violations alleged and "may have performed acts and made statements in furtherance thereof," as alleged in paragraph 79 of the Amended Complaint.

Response to Request No. 10:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,

1 and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete
2 record and review and analyze all information obtained in discovery thus far at this stage of this
3 litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,
4 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and
5 duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on
6 the grounds that it seeks, in contravention to well-established legal principles, to dismember the
7 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
8 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
9 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
10 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
11 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
12 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
13 Defendants and co-conspirators concealed the conspiracy by various means and methods,
14 including concealing the existence and nature of their conspiratorial activities and issuing regular
15 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
16 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
17 calls for information that is covered by attorney-client privilege or the work-product protection.
18 Sharp further states that it has not completed its discovery and preparation in this matter and that
19 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
20 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

21 Subject to and without waiving the foregoing objections, Sharp states that the response to
22 this Interrogatory may include the transactional data and documents produced by defendants, co-
23 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
24 responsive to this Interrogatory from review of the documents and data identified in this response
25 is substantially the same for either Sharp or TAIS. Sharp further states that information
26 responsive to this Interrogatory is contained in the following, which are incorporated here by
27 reference:

- 28 • Exhibit A to these Responses;

- 1 • Attachment A to these Responses;
- 2 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
- 3 materials;
- 4 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 5 materials;
- 6 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 7 accompanying materials;
- 8 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 9 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 10 • The European Commission Report on the CRT Conspiracy;
- 11 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 12 Set of Interrogatories, No. 5 (February 10, 2012);
- 13 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 14 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 15 2013);
- 16 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 17 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 18 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 19 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 20 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 21 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 23 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 24 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 25 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 26 of Interrogatories (July 10, 2014);
- 27 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 28 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);

- 1 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 3 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
4 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
5 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories (November 2, 2011);
- 7 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
8 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
9 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories (December 23, 2011);
- 11 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
12 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 13 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
14 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 15 • Philips Electronics North America Corporation's Responses to Direct Action
16 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 17 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
18 Interrogatories (May 12, 2010);
- 19 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
20 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 21 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
22 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 23 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
24 (November 25, 2013);
- 25 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
26 Admission (November 25, 2013);
- 27
- 28

- 1 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 2 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 3 Interrogatories (February 10, 2012);
- 4 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 5 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 6 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 7 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 8 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 9 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 10 those Responses (July 28, 2014);
- 11 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 12 Interrogatories to Sharp (August 4, 2014);
- 13 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 14 2014);
- 15 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 16 Interrogatories to Sharp (August 4, 2014);
- 17 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 18 4, 2014);
- 19 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 20 (August 4, 2014);
- 21 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 22 (August 21, 2014);
- 23 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 24 Interrogatories to Sharp (August 21, 2014); and
- 25 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 26 (August 25, 2014).
- 27
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Request No. 11:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Thai CRT participated as a co-conspirator in the violations alleged and “may have performed acts and made statements in furtherance thereof,” as alleged in paragraph 79 of the Amended Complaint.

Response to Request No. 11:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because Defendants and co-conspirators concealed the conspiracy by various means and methods,

1 including concealing the existence and nature of their conspiratorial activities and issuing regular
2 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
3 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
4 calls for information that is covered by attorney-client privilege or the work-product protection.
5 Sharp further states that it has not completed its discovery and preparation in this matter and that
6 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
7 response to this Request consistent with Federal Rule of Civil Procedure 26(e).

8 Subject to and without waiving the foregoing objections, Sharp states that the response to
9 this Interrogatory may include the transactional data and documents produced by defendants, co-
10 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
11 responsive to this Interrogatory from review of the documents and data identified in this response
12 is substantially the same for either Sharp or TAIS. Sharp further states that information
13 responsive to this Interrogatory is contained in the following, which are incorporated here by
14 reference:

- 15 • Exhibit A to these Responses;
- 16 • Attachment A to these Responses;
- 17 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
18 materials;
- 19 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
20 materials;
- 21 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
22 accompanying materials;
- 23 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 24 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 25 • The European Commission Report on the CRT Conspiracy;
- 26 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
27 Set of Interrogatories, No. 5 (February 10, 2012);
- 28

- 1 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
2 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
3 2013);
- 4 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
5 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 6 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
7 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 8 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 10 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
11 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
12 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
14 of Interrogatories (July 10, 2014);
- 15 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
16 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 17 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
18 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 19 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
20 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
21 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
22 Interrogatories (November 2, 2011);
- 23 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
24 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
25 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
26 Interrogatories (December 23, 2011);
- 27 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
28 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);

- 1 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 2 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 3 • Philips Electronics North America Corporation's Responses to Direct Action
- 4 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 5 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 6 Interrogatories (May 12, 2010);
- 7 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 8 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 9 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 10 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 12 (November 25, 2013);
- 13 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 14 Admission (November 25, 2013);
- 15 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 16 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 17 Interrogatories (February 10, 2012);
- 18 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 19 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 20 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 21 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 22 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 23 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 24 those Responses (July 28, 2014);
- 25 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 28 2014);

- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 12:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Chunghwa PT "manufactured, sold and/or distributed CRT products either directly or through its subsidiaries or affiliates (such as Fuzhou subsidiary) throughout the United States," as alleged in paragraph 94 of the Amended Complaint.

Response to Request No. 12:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Accordingly, Sharp objects to this Interrogatory on the grounds that it is premature,